

Whistle Blowing Policy Statement

08.12.2025

Introduction

Manning Construction Ltd is a construction company delivering civil engineering and construction projects. The aim of this policy is to encourage staff to report suspected wrong-doing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate, and that their confidentiality will be respected. The purpose of this paper is to:

- Provide staff with guidance as to how to raise those concerns
- Reassure staff that they can raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy applies to all individuals working at all levels of the organisation, including directors, senior managers, employees, contractors, part-time and fixed-term workers, casual and agency staff.

If you have any concerns about actual or suspected wrong-doing at work concerning any criminal offence, miscarriage of justice, bribery, failure to comply with legal obligations, health and safety danger, environmental risk or a concealment of any of these, you are encouraged to use the procedure set out below in good faith.

Confidentiality Reporting

Our intention is that staff will feel able to voice concerns openly under this policy and we will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith when they are made anonymously. However, if you want to raise your concern confidentially, we will endeavour to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary, the company reserves the right to make such a referral without your knowledge and consent.

External Reporting

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrong-doing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that, in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely – if ever – be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

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Whistle-blowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a customer, subcontractor, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager for guidance.

Reporting Concerns

If appropriate, discuss the matter with your line manager in the first instance. They may be able to resolve your concern quickly and effectively. In some cases they may refer the matter to the Managing Director. However, where the matter is more serious or you feel that your line manager has not addressed your concern, you should contact the Managing Director.

Investigation Procedure

We will aim to give you an indication of how we propose to deal with the matter. You may be required to attend additional meetings or to provide further information. If the matter requires further investigation, such an investigation will be carried out and we aim to give you an indication of the outcome of the investigation and what, if any, action has been taken. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any action taken as a result. You must treat any information about any investigation as confidential.

We will deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

No Reprisal

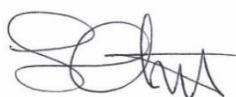
If you are concerned about reprisals if your identity is revealed, you should raise the matter with the Managing Director. Manning Construction Ltd will not subject any employee who makes a disclosure in good faith under this Policy to any detriment (including dismissal, disciplinary action, threats or other unfavourable treatment). In the event that you believe you are being subjected to negative, threatening or retaliatory treatment by any person within the company as a result of your decision to invoke the procedure you must inform the Managing Director immediately and appropriate action will be taken to protect you from any reprisals. Anyone involved in such conduct against you will be subject to disciplinary action

Disciplinary Action

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons, for self-advancement or to pursue a personal grudge against another, this will constitute misconduct and will be dealt with in accordance with the terms of the disciplinary procedure.

Further Advice and Guidance

In the event that you are unsure whether you should raise an issue under this policy, or you need advice as to how to do so, free confidential advice is available from Protect (telephone 020 3117 2520). Protect is a charity with the objective of promoting compliance with the law and good practice.



Mr. Stephen Euston
Managing Director